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(D. P. Remini)

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September 22, 2005

Mr. John F. Carter
Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 95105

**Re: Comments Regarding FDIC Application #20051977; Wal-Mart
Application for Insurance and Industrial Bank Charter**

Dear Mr. Carter:

Good jobs vs. Wal-Mart jobs; Well-insured employees vs. Wal-Mart insured employees; Communities of small businesses vs. a "Wal-Mart community." These are all issues that are posed by community leaders whenever a Wal-Mart is looking into entering a new community. And now, Wal-Mart is looking to enter the financial services sector? These same issues will be posed, and evermore so if Wal-Mart is allowed to receive an insurance and industrial bank charter. I am writing to oppose the application of Wal-Mart Stores, Inc., for Federal deposit insurance coverage for an ILC charter in Utah. I am a community bank vice president with responsibilities including human resources, lending, information technology and business development and believe strongly that allowing Wal-Mart to own a bank charter and potentially open branches in its network of stores would do irreparable harm to my community and my institution, and pose a severe systemic risk to our nation's economy by creating a *huge* potential conflict of interest.

I am aware that Wal-Mart has stated that it intends to operate a limited ILC charter in Utah. I am skeptical. Their assurances that the operation will remain narrow ring hollow in the context of the company's history and corporate philosophy. This is Wal-Mart's fourth attempt to get into the banking business. Wal-Mart's CEO says he wants to grow the company and provide financial services to its customers. It is not much of a stretch to conclude that somewhere down the road, Wal-Mart will be amending its business plan to allow it to offer a full array of banking services. This must not be allowed to happen.

Wal-Mart has a long history of destabilizing communities by undercutting prices of local merchants and driving them out of business. That is not a theory, it is a fact. For example, when Wal-Mart entered Iowa, 50% of clothing stores, 30% of hardware stores, 42% of variety stores, 26% of department stores, and 25% of building materials stores were driven out of business. Were Iowa consumers well-served by eliminating Wal-Mart's competitors and denying consumer choice? I think not. Think of the economic consequences of those statistics, and the impact it had on the state of Iowa! Communities recover from natural disasters; man-made ones are much longer lasting.

We're The Only Bank You'll Ever Need!

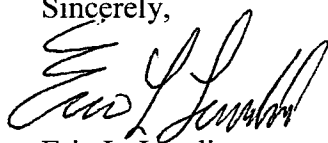
Wal-Mart did not open stores in those communities to be civic partners with local merchants; they opened stores to drive local merchants out of business and steal their customers, which is just what they did. The largest company in the world could do the same thing to community banks. The FDIC would be ill-advised to set this nation on a course that could result in the demise of the community banking industry as we know it today.

Congress has reaffirmed our nation's long standing policy against the mixing of banking and commerce, and with good reason. Mixing banking and commerce would create serious conflicts of interest and distort credit decisions. The impartial allocation of credit is the linchpin of our financial system and must be preserved. Would a Wal-Mart Bank offer credit at reasonable terms to its competitors? Would Wal-Mart require its suppliers to bank at the Wal-Mart bank similarly as it dictates supply chain information, technology decisions, and pricing to its suppliers?

The thought of a man in a blue Wal-Mart shirt asking me to do self-banking as they do with self check-outs is frightening. What's next, loan applications approved or denied based on *strictly* a formula in the Wal-Mart Bank's massive computer system in Bentonville, AR? Will they be able to make decisions on what's best for the *community*? Will Wal-Mart be able to provide loans for a clothing store, a hardware store, or another potential Wal-Mart competitor? Where's the local hometown decision making this country was founded on? Where's the gut feeling about a family's first mortgage going to come from in Wal-Mart's cut-throat business mentality? The answer to these questions is simple – they should not even be in that position.

For the sake of the community banks of our nation and specifically the community we serve here in Northern Michigan, please do not allow Wal-Mart to get into the banking business.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eric L. Lundin", written in a cursive style.

Eric L. Lundin
Vice President